

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**In Re: Methyl Tertiary Butyl Ether (“MTBE”)
Products Liability Litigation**

**Master File No. 1:00-1898
MDL 1358 (SAS)
M21-88**

This document relates to:

City of Fresno v. Chevron U.S.A. Inc., et al

**SUPPLEMENTAL DECLARATION OF JEREMIAH J. ANDERSON IN SUPPORT OF
CERTAIN DEFENDANTS’ MOTION FOR PARTIAL SUMMARY JUDGMENT ON
PLAINTIFF’S NUISANCE CLAIMS**

DECLARATION OF JEREMIAH J. ANDERSON

I, Jeremiah J. Anderson, declare as follows:

1. I am a member of the State Bar of Texas and a partner in the law firm of King and Spalding LLP, counsel for Defendants Chevron U.S.A. Inc. and Union Oil Company of California in this litigation. I make this Declaration in support of Certain Defendants' Motion for Partial Summary Judgment on Plaintiff's Nuisance Claims. During the course of this litigation, I have actively participated in pretrial matters, including discovery, document review, and motion practice. This Declaration is based on my personal knowledge and, if called as a witness, I could testify competently thereto.

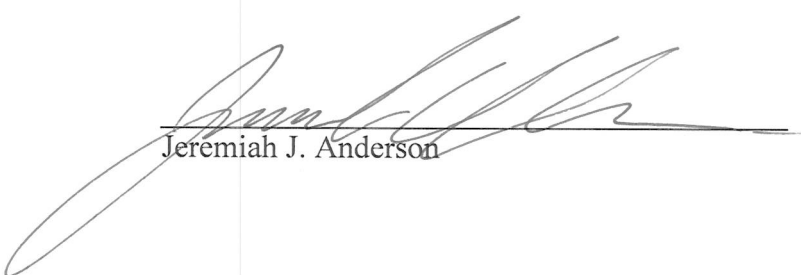
2. Attached hereto as Exhibit 14 are true and correct copies of certain documents relevant to the M&S Texaco located at 2619 S. East Avenue. Specifically, the following items are attached:

- a. Relevant excerpts from the August 11, 2011 deposition transcript of Jatinder Paul Dhillon.
- b. Shell Defendants' Objections and Responses to Plaintiff City of Fresno's First Set of Interrogatories to Defendants, dated November 10, 2008, pages 1 and 28.

3. Attached hereto as Exhibit 15 is a true and correct copy of excerpts from the April 10, 2012 deposition transcript of Marcel Moreau.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

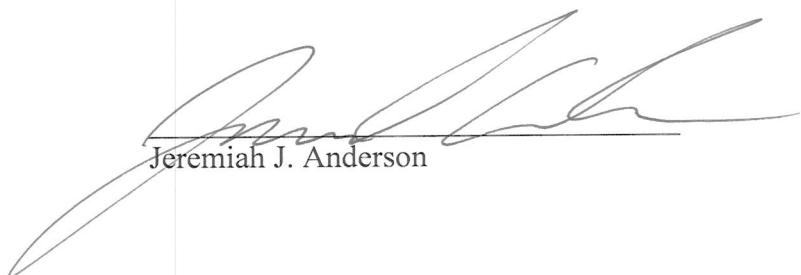
Executed in Houston, Texas on this 26th day of April, 2013.



Jeremiah J. Anderson

Certificate of Service

I hereby certify that on the 26th day of April 2013, a true, correct, and exact copy of the foregoing document was served on all counsel via LexisNexis File& Serve.



Jeremiah J. Anderson